

Minutes for Rule 21 Working Group Meeting #62
December 2, 2004
SDG&E - San Diego, CA

There were 28 Working Group members in attendance at Meeting No. 62 in person or conferenced in by telephone. The next regular meeting of the Working Group is scheduled for January 13 at the CEC headquarters, Sacramento.

Scott Tomashefsky, Chair

Aldridge	Pat	SCE	Iliev	Karl	SDG&E
Alferos	Felicia	SDG&E	Jackson	Jerry	PG&E
Blair	Tom	City of San Diego	Lacy	Scott	SCE
Blumer	Werner	CPUC/ED	Mazur	Mike	3 Phases Energy
Brooks	Bill	Endecon	Mekonnen	Zerihun	SCE
Brown	David	SMUD	Panora	Bob	Tecogen
Browy	Lisa	SDG&E	Prabhu	Edan	Reflective Energies
Clowers	Herb	Hess Microgen	Ross	Jim	CAC/EPUC
Cook	Bill	SDG&E	Sheriff	Nora	CAC/EPUC
Couts	George	SCE	Solt	Chuck	Lindh & Assoc
Edds	Michael	DG Energy Sol	Sorter	Chuck	BluePoint Ergy
Grebel	Ed	SCE	Torribio	Gerome	SCE
Houck	Darcie	CEC	Vaziri	Moh	PG&E
Iammarino	Mike	SDG&E			

Process and Combined Group

Rule 21 Revisions Advice Letter Progress and Status

SCE and SDG&E have filed advice letters that will more closely incorporate IEEE 1547 provisions throughout the Rule 21 tariffs. SDG&E's filing has been awaiting resolution of an ongoing protest by the City of San Diego regarding the ability of Rule 21 to export power. The City of San Diego has withdrawn its protest and Werner Blumer approved the SDG&E advice letter during the meeting on Dec. 2. The SCE advice letter should be approved within the next week and PG&E expects to submit its advice letter by Christmas.

Consistent with working group discussions several months ago, the IOUs will now prepare advice letters seeking approval to revise certain elements of the current Interconnection Application form. The contents of the Application Form were developed by the Working Group in the first half of 2004 with changes sequenced to occur after the Rule 21 tariff changes were adopted.

DG Activity Reports

The SDG&E and SCE DG activity reports were distributed before the meeting. PG&E intends to submit its report within the next couple of weeks.

DG OII (CEC-04-Dist-Gen) Action item review

The final document, *Rule 21 Working Group Recommended Changes to Interconnection Rules*, was submitted to the Energy Commission's Integrated Energy Policy Report Committee on November 10th. It is docketed at OII Docket 04-DIST-GEN-1-03-IEP-1 as 500-04-087SD.

Comments were received November 30 from the City of San Diego, RCM Digesters, PG&E, SCE, and CAC/EPUC. A short review of the comments from PG&E was presented, upon which it was recommended that the Energy Commission incorporate most of the language changes into its next version of the report submitted by the Integrated Energy Policy Report (IEPR) committee.

CEC Integrated Energy Policy Report Committee Meeting

The IEPR Committee is scheduled to hold a hearing on December 10 to review, evaluate and receive public comment on the Rule 21 Working Group paper. The WG discussed the meeting format and agenda. It will likely consist of several panel discussions among the five topics in the white paper. After general introductions and a general overview of the paper, we will do the following:

- a) Network System Interconnection Rules: 10-15 minute overview by Chuck Whitaker
- b) Dispute Resolution Process: 30 minute panel discussion
- c) Interconnection Fees/Review: 45 minute panel discussion
- d) Metering for Projects with Net Metered and Non-Net Metered Technologies: 45 minute panel discussion
- e) Net Generation Output Metering Requirements: 60-90 minute discussion.

For each issue requiring a panel discussion, utility representatives and key DG industry stakeholders will share their perspectives and/or respond to other comments related to the topic area.

Representatives from RealEnergy, Capstone, Tecogen, and perhaps others will represent DG stakeholder perspectives. Representatives from SCE, PG&E, and SDG&E will represent some of the utility perspectives.

After this meeting, the Committee will prepare a final report that should be completed the week of January 6. There will be a public comment period which will end January 20, and the report will be considered for adoption by the Commission. It will then go to the CPUC for consideration in R.04-03-017.

Supplemental Review Guideline

A revised version of the Guideline, incorporating changes to the line section discussion, and adding sections on inadvertent export and alternate testing procedures, will be posted on the CEC web site. (Later: the revised guideline has been sent to the Commission for posting)

Status of Utility Responses to EPUC/CAC Discovery Request

SDG&E declined to respond to the EPIC/CAC data request. PG&E and SCE are scheduled to respond today (Dec. 2).

Technical Breakout Group Notes

Reviewed Action Item List:

T107 Clarify issue of “utility-approved”—Done—. Language added to Supplemental Review Guideline in Section 7.8.1.

T110 Plan to develop requirements for DG on Secondary Networks—Done—.

Recommendations drafted by Moh Vaziri, Jeff Goh, Chuck Whitaker and Technical Group that were submitted in the November 10, 2004 version of the Rule 21 Workshop recommendations to the OIR.

T121 Correct Error in Line Section Definition—Done—Revised Supplemental Review Guideline with corrected definition to be posted shortly. Discussed need to change the Line Section definition to include the distribution transformer fuse as a section boundary. Group decided that the definition was adequate as is, but that Moh Vaziri will draft a separate discussion for the Supplemental Review Guideline to define under what circumstances the fuse may need to be considered as the boundary for a line section (see new action item T136).

T113 Clarify "no single failure" section of D.1.c —in process—Provide discussion of methods to meet "no single failure" with a focus on redundant relaying from a utility perspective—to be drafted by Moh Vaziri for discussion at next meeting.

T137 Methods of Redundancy—NEW—Provide a discussion how manufacturers apply redundancy in their product design to inform the working group of existing redundant features of equipment—to be drafted by Chuck Sorter of Bluepoint Energy for discussion at next meeting.

T119 Probability of Islanding—on going—DUIT has a paper on the probability of islanding that should be shared with the working group. The paper has yet to be publicly released, but some indication of when this report will be made public needs to be made at the next meeting on January 13, 2005 in Sacramento.

T133 Complete Missing Screens in Supplemental Review —on going—Provide additional information for the Supplemental Review Guideline relative to screens that have not been addressed. Scott Lacy of SCE offered to draft a discussion on how to mitigate the effects of Starting Voltage Drop for generators that fail this screen. Initial discussion gave examples such as soft-starting or increasing the capacity of an undersized service at a facility that has experienced significant load growth.

T136 Line Section Definition: Transformer Fuse—NEW—Provide a discussion of when and why a distribution transformer fuse may need to be considered as the boundary point for a line section—Moh Vaziri agreed to draft a one-page discussion on the issue for the next meeting.

C101 Clarifications to Export —Done—Discussions at the October 27 meeting in Oakland dealt with finalizing the Export Screen and sent it out for final comments on October 28. No substantive comments were received in opposition to the current version so it was decided to declare this item completed. Special thanks goes to Karl Iliev for his tenacity in sticking with this item and getting it completed. The December 2, 2004 meeting was Karl's last meeting on Rule 21 since he is moving to a new area with SDG&E. A copy of the screen is attached to this report.

Rules for DG on Network Systems:

David Brown of SMUD informed the group that New York has established interconnection guidelines for DG on network systems http://www.dps.state.ny.us/SIR_December_2003_Draft-redline.pdf. Also, Dave provided a draft write-up that represents SMUD's current thinking on requirements for "inconsequential" generators on network systems. That document is attached to this report.

Supplemental Guideline Document Modifications:

Chuck Whitaker sent out the latest version 7 of the Supplemental Review Guidelines on November 30. The revisions in this document were reviewed and slight wording changes were made to the 7.8.1 discussion on non-certified equipment. (Later: A final version, showing changes from the previously posted draft has been sent to the Energy Commission for posting on its web page.)